



COUNTY OF LEHIGH
DEPARTMENT OF CORRECTIONS

38 NORTH 4th STREET, ALLENTOWN, PENNSYLVANIA 18105
(215) 820-3608

RICHARD O. KLOTZ
DIRECTOR

Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the matter of)
Billed Party Preference) CC Docket 92-77
For O+InterLATA Calls)

COMMENTS OF THE LEHIGH COUNTY DEPARTMENT OF CORRECTIONS

FROM: RICHARD O. KLOTZ,
DIRECTOR OF CORRECTIONS

RE: THE DETRIMENTAL EFFECTS THAT APPROVAL OF BILLED PARTY
PREFERENCE WILL HAVE ON CORRECTIONAL INSTITUTIONS THAT
RELY ON EFFICIENT, SECURE, REVENUE-GENERATING INMATE
TELEPHONE SYSTEMS.

On behalf of the Lehigh County Department of Corrections, I am urging
you to defeat the proposal to implement Billed Party Preference (BPP).
As overseer of a large county correctional facility, I have the unique
advantage of being able to discuss the benefits reaped by utilizing
contracted inmate telephone services.

The Lehigh County Department of Corrections has been using contracted
inmate telephone services for several years and has been well-satisfied
with those services.

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Should BPP be initiated, the Department and the taxpayers of Lehigh

County stand to lose significantly.

In 1993, contracted inmate telephone service generated nearly \$200,000 in commissions that were returned to the County's General Fund. To date this year, the Department has collected nearly \$100,000 in commissions.

These funds represent a significant contribution to the county's financial pool. BPP will effectively eliminate our ability to collect those commissions.

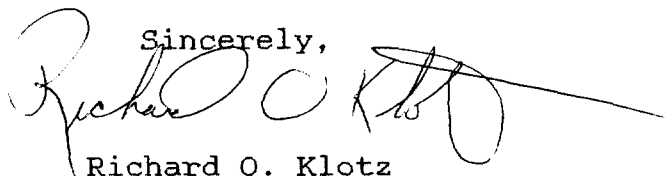
In addition, contracted vendor services to correctional institutions are critical from a security perspective. Jails and prisons can install anti-fraud devices which cut off any collect call to a location where third party or conference calls are detected for the purpose of illegally getting free outside lines at the expense of those who have answering machines or voice mail on their phone service. Inmate telephone services also allow us the very important options of controlling calls that are designed to harass or terrorize witnesses, jurors, prosecutors or anyone else who might become the the target of a jailhouse predator. If we lose the option of choosing our own inmate telephone service, which BPP would effectively accomplish, we lose the ability to protect the community from terroristic telephone threats.

Lastly, BPP will have an adverse effect on our staff. The existing open calling system allows corrections staff to spend their time monitoring activities in the housing unit rather than on the telephones. Passage of BPP eliminates our options and creates a security situation that will mandate staffing positions to telephone monitoring. The Lehigh County Prison has almost 100 collect inmate phones. These phones are the responsibility of a vendor and we have minimal responsibility. Under BPP, we would have to somehow deal with installing and maintaining a system at our cost. Since few if any correctional facilities can afford that luxury, inmate access to the outside world could be severely curtailed.

BPP offers nothing to the corrections world -- inmates don't care who pays for a call as long as they don't have to, and prison administrators will find their hands tied in terms of security and revenue issues.

We ask that the Commission defeat the BPP proposal -- or at least exempt corrections facilities from its restrictions.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard O. Klotz", with a long horizontal flourish extending to the right.

Richard O. Klotz
Director of Corrections